REMARKS

This response is intended as a complete response to the Final Office Action dated October 31, 2006. In view of the following discussion, the Applicants believe that all claims are in allowable form.

The Applicants thank Examiners Angadi and Tran for their time and comments during the conference with Steven Shannon and Alan Taboada on February 6, 2007. The Applicants have nothing further to add to the comments provided by the Examiner in the Interview Summary given to the Applicants at the conclusion of the meeting.

CLAIM AMENDMENTS

The Applicants have amended dependent claim 12 to more clearly recite aspects of the invention. The Applicants submit that this amendment was made for reasons unrelated to patentability, that no new matter has been entered, and that no new search is required to consider this amendment. Accordingly, the Applicants respectfully request entry and consideration of this amendment.

CLAIM REJECTIONS

A. 35 USC §103 Claims 1-3, 10, and 40-46

Claims 1-3, 10, and 40-46 stand rejected under 35 USC. §103(a) as being unpatentable over U.S. Patent Application Publication No. 2003/0127319 to *Demaray, et al*. (hereinafter *Demaray*). The Applicants respectfully disagree.

Claim 1 recites limitations not taught or suggested by any combination of the cited art. *Demaray* discloses a physical vapor deposition (PVD) process utilizing "radio frequency (RF) sputtering of a wide target in the presence of a sputtering gas under a condition of uniform target erosion." (*Demaray,* p. 1, ¶ [0009].) The RF sputtering process may be a dual frequency RF sputtering process, in which a low frequency RF power is applied to the target to bombard a substrate with ions from the plasma and in which a higher frequency RF power is

applied to the target to accelerate electrons in the plasma and sputter the target material. (*Id.*, p. 5, ¶ [0043].)

However, *Demaray* fails to teach or suggest any interaction between the first and second RF signals applied to the target – *Demaray* merely discloses that each signal is utilized to provide independent benefits in the disclosed PVD process. Moreover, *Demaray* fails to teach or suggest that such an interaction may be utilized to control any characteristics of the plasma. In addition, the teachings of *Demaray* relate to applying dual frequency signals to a target in a PVD chamber. Accordingly, *Demaray* fails to teach or suggest supplying a first RF signal to a first electrode disposed in an etch processing chamber; and supplying a second RF signal to the first electrode, wherein an interaction between the first and second RF signals is used to control at least one characteristic of a plasma formed in the etch processing chamber, as recited in amended claim 1. As such, a *prima facie* case of obviousness has not been established because *Demaray* fails to teach or suggest the limitations recited in amended claim 1. Thus, claim 1 is patentable over *Demaray*.

In the Response to Arguments section of the Final Office Action and during the above-noted interview with Examiners Angadi and Tran, Examiner Angadi cites *Demaray* paragraph [0043], and discusses *Demaray's* teaching of the application of two RF frequency signals to an electrode to control various aspects of the PVD deposition process. However, as noted above, the cited portion of *Demaray* – as well as the Examiner's comments in the Office Action and the Response to Arguments section - discusses independent control of different plasma characteristics and fails to teach or suggest that an interaction between the first and second RF signals is used to control at least one characteristic of a plasma formed in the etch processing chamber, as recited in claim 1. Accordingly, the Applicants respectfully maintain that claim 1 is patentable over *Demaray*.

With respect to claim 2, the Applicants respectfully disagree with the Examiner's rejection. The Examiner contends that the teachings of *Demaray*

read on Applicant's claim "where the dual frequency causes a sheath modulation." However, claim 2 does not recite that the dual frequency causes a sheath modulation, as asserted by the Examiner. Claim 2 further limits claims 1 by reciting, "wherein the plasma characteristic [controlled by the interaction between the first and second RF signals] is at least sheath modulation."

In addition, the portions of *Demaray* cited by the Examiner relate to different aspects of the PVD process. Specifically, paragraph [0043] relates to the effects of the dual frequencies applied to the PVD target, while paragraph [0047] discusses the plasma sheath formed when a bias power is applied to a substrate. As such, *Demaray* teaches that a bias power may be applied to form a plasma sheath, and not that an interaction between two RF signals may be used to control the plasma sheath. Thus, *Demaray* not only fails to teach or suggest any interaction between the first and second RF signals, but further fails to teach or suggest that any interaction between the first and second RF signals have any effect on the plasma sheath. Accordingly, *Demaray* fails to teach or suggest that any interaction between the first and second RF signals is used to control at least sheath modulation of the plasma, as recited by claim 2.

Moreover, in the Response to Arguments section of the Final Office Action, while the Examiner asserts that *Demaray* paragraph [0047] teaches that an interaction between the RF signals results in sheath modulation, the Examiner admits that *Demaray* teaches that "the sheath formation in the chamber is due to application of bias to the substrate." While the Examiner notes that this is akin to applying a low frequency RF signal to the high frequency signal, *Demaray* clearly teaches that the application of the separate bias signal is what is used to create the plasma sheath about the substrate. (*Demaray*, para. [0047].) Thus, claim 2 is further patentable over *Demaray*.

With respect to claim 10, the Applicants respectfully disagree with the Examiner's rejection. Specifically, the Examiner states that *Demaray* uses "dual frequency for the target to improve film characteristics as well as film uniformity which is an attribute of power distribution uniformity," citing *Demaray*, ¶[0023].

(Office Action, p. 4, ll. 9-11.) *Demaray* teaches to deposit a uniform film through a uniform target erosion obtained in one of two disclosed ways: diode sputtering, or a magnetron sputtering process. (*Demaray*, p. 3, ¶¶ [0029]-[0030].)

However, *Demaray* fails to teach or suggest controlling the power distribution within the plasma, let alone controlling the power distribution within the plasma via an interaction between the first and second RF signals. Accordingly, *Demaray* fails to teach or suggest that any interaction between the first and second RF signals is used to control at least a power distribution within the plasma, as recited by claim 10.

In the Response to Arguments section of the Office Action, the Examiner asserts that paragraph [0043] of Demaray teaches to use the first and second RF frequencies and modulating the flow of charge carriers to control the power distribution in the plasma. However, the Applicants note that the cited portion of *Demaray* teaches applying a high frequency signal for sputtering the target and applying a low frequency signal to cause ions in the plasma to bombard the film being deposited on the substrate, and fails to teach or suggest an interaction between the first and second RF signals is used to control the power distribution in the plasma, as recited in claim 10. Accordingly, a *prima facie* case of obviousness has not been established with respect to claim 10, as the cited reference fails to teach or suggest all the limitations recited in the claim. Thus, claim 10 is further patentable over *Demaray*.

With respect to claim 40, the Examiner asserts that *Demaray* teaches an electrode 19 beneath a substrate 16 support surface in an etch chamber. However, the Applicants note that the physical vapor deposition chamber of *Demaray* applies dual frequencies to a target disposed above a substrate in the PVD chamber. As such, *Demaray* fails to teach or suggest a method wherein the first electrode is disposed beneath a substrate support surface in the etch chamber, as recited in claim 40.

With respect to claims 43-44 and 45-46, those claims respectively depend from independent claims 34 and 37. As claims 34 and 37 are not rejected as

being unpatentable under *Demaray*, the present rejection of claims 43-46 is not appropriate and should be withdrawn.

Thus, the Applicants submit that claims 1-3, 10, and 40-46 are patentable over *Demaray*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claim allowed.

B. 35 USC §103 Claims 4-9 and 11-12

Claims 4-9 and 11-12 stand rejected under 35 USC §103 as being unpatentable over *Demaray*, and further in view of *Georgieva et al.*, Journal of Applied Physics, V. 94, No. 6, Sept. 15, 2003, pgs 3748-3756 (hereinafter *Georgieva*). The Applicants respectfully disagree.

Independent claim 1, from which claims 4-9, 11 and 12 depend, recites limitations not taught or suggested by any permissible combination of the cited art. The patentability of claim 1 over *Demaray* is discussed above. *Georgieva* is cited to assert various effects of dual frequency RF on a plasma. However, *Georgieva* generally compares single frequency processing to a dual frequency processing. Specifically, *Georgieva* discloses potential and electric field distributions, electron and ion density distributions, and electron and ion energy distributions for single and dual frequency plasma processing. However, *Georgieva* fails to teach or suggest that an interaction between the frequencies (as compared to the individual frequencies themselves) applied in a dual frequency chamber may be utilized to control plasma properties. As such, *Georgieva* fails to teach or suggest a modification to the teachings of *Demaray* that would yield the limitations recited in claim 1. As such, a *prima facie* case of obviousness has not been established as the combination of the cited references fails to yield the limitations recited in the claims.

Moreover, with respect to claim 4, the Examiner asserts that "with the proper choice of the above parameters, one of ordinary skill in the art would be able to obtain an IEDF of any desired shape…." However, the Applicants note that in order to satisfy the burden of creating a *prima facie* case of obviousness,

there must be some motivation or suggestion in the cited references, or in the general knowledge available to one of ordinary skill in the art at the time the invention was made, to modify the reference(s) in a manner that would yield the claimed invention. (*MPEP* §2142, citing *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).) "The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination." (*MPEP* §2143 III, citing *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990).)

In this instance, a *prima facie* case of obviousness has further not been established as the Examiner has not provided a motivation or suggestion to combine the references in a manner that would yield the limitations recited in claim 4. The Examiner has similarly not provided any motivation to modify *Demaray* in view of *Georgieva* with respect to the limitations recited in claims 5-6. In addition, with respect to claim 6, the Applicants rely on the plain meaning of the term "peak-to-peak" sheath voltage and submit that no special definition is required.

With respect to claims 7-8, the Examiner states that *Demaray* teaches that each frequency controls a different aspect of the plasma – the high frequency is applied for one purpose and the low frequency for another. (*Final Office Action*, p. 6, l. 18 – p. 7, l. 3.) The Applicants agree that *Demaray* only teaches that the frequencies independently control different plasma characteristics and fails to teach or suggest that an interaction between the two frequencies applied to a single electrode may be used to control at least one characteristic of a plasma, as recited in the claims. Thus, claim 1, and all claims depending therefrom, are patentable over *Demaray*, alone or in combination with *Georgeiva*.

With respect to claim 9, the Applicants note that the third RF signal 18 of *Demaray* (cited by the Examiner as used to form the plasma) is only taught by *Demaray* as utilized for providing a substrate bias and not for forming a plasma. Demaray teaches to use RF generator 14 to apply power to the target 12 to generate a plasma. (Demaray, ¶ [0039].) Accordingly, claim 9 is further

patentable over the cited art as the combination of *Demaray* and *Georgeiva* fails to yield the limitations recited in the claims.

With respect to claims 11-12, the Examiner maintains his original rejection and asserts, in the Response to Arguments section, that "Georgeiva presents extensive simulation results of the potential and electric-field distribution in the single and dual-frequency regime." (Final Office Action, p. 14, ¶ (d).) However, the Applicants note that Figures 2-3 of *Georgieva* merely depict potential and electric-field distributions as a function of phase (time) and position (distance from the driven electrode) for a single frequency (Figure 2) and from a dual frequency (Figure 3) chamber. (*Georgieva*, p. 3752, ll. 12-14; Figs. 2-3.) However, *Georgeiva* fails to teach or suggest how spatial distributions may vary as a function of frequency. Accordingly, *Georgeiva* fails to teach or suggest a modification to the teachings of *Demaray* that would result in a process wherein the first and second RF signals provide similar plasma excitation properties and different spatial uniformity profiles, as recited in claim 11. In addition, *Georgeiva* fails to discuss the results any interaction between the two RF signals over a range of frequencies and/or power ratios. *Georgeiva* further fails to discuss the results any such interaction between the two RF signals may have on the power distribution in the plasma. Accordingly, *Georgeiva* further fails to teach or suggest a modification to the teachings of *Demaray* that would result in a process wherein the interaction between the first and second RF signals is a varying effect on the power distribution in the plasma, as recited in claim 12.

Thus, the Applicants submit that claims 4-9, 11-12 are patentable over *Demaray*, and further in view of *Georgieva*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claims allowed.

C. 35 USC §103 Claims 13 and 33

Claims 13 and 33 stand rejected under 35 USC §103 as being unpatentable over *Demaray*, in view of *Georgieva*, and in further view of

Lieberman et al. (Plasma Sources Sci. Technol., 11 (2002), pages 283-293) (hereinafter *Lieberman*). The Applicants respectfully disagree.

Independent claim 1, from which claims 13 and 33 depend, recites limitations not taught or suggested by any permissible combination of the cited art. The patentability of claim 1 over *Demaray* in view of *Georgieva* is discussed above. *Leiberman* is cited to show that radial plasma electric field distribution is different for varying frequencies. However, *Leiberman* fails to teach or suggest supplying a first RF signal to a first electrode disposed in an etch processing chamber and supplying a second RF signal to the first electrode, wherein an interaction between the first and second RF signals is used to control at least one characteristic of a plasma formed in the etch processing chamber, as recited in claim 1. Accordingly, *Leiberman* fails to teach or suggest a modification to the combination of *Demaray* in view of *Georgieva* that would yield the limitations recited in claim 1. Thus, a *prima facie* case of obviousness has not been established as the combination of the cited references fails to yield the limitations recited in the claims.

Furthermore, with respect to claim 13, the Examiner asserts that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify the method of *Demaray* to obtain even higher uniformity by selecting the proper parameters for the plasma and combining complementary first and second frequencies energy distributions to obtain an net radial power distribution that is substantially uniform." (Office Action, p. 8) (emphasis added). However, no cited reference teaches or suggests how selecting or controlling the proper parameters for the plasma is performed.

Moreover, the Applicants respectfully disagree with the Examiner's assertion that *Leiberman* teaches how spatial power distribution depends upon frequency and that one of ordinary skill in the art would be motivated to modify *Demaray* with the teachings of *Leiberman* "in order to obtain a highly uniform process area… by combining frequencies with complementing energy or power distributions." (Final Office Action, p. 8, ll. 18-21.)

Leiberman provides only two examples of frequencies (13.56 MHz and 40.7 MHz). (*Leiberman*, Figs. 4-15, and accompanying text.) While *Leiberman* shows that the resultant power distributions are not the same for these frequencies, *Leiberman* in no way teaches or suggests that these frequencies, or other frequencies are complementary and may be combined to form a net power distribution that is substantially uniform. Specifically, *Leiberman* does not discuss how the power distribution varies over a range of frequencies. Furthermore, *Leiberman* does not discuss resultant power distributions that may occur upon applying multiple frequencies to a single electrode. Accordingly, *Leiberman* fails to provide any teaching or suggestion that would allow one of ordinary skill in the art to modify the teachings of *Demaray* to yield a method wherein the first and the second RF signals are selected such that a combined effect of the first and second RF signals produces a substantially flat power distribution, as recited in claim 13.

With respect to claim 33, the Examiner asserts that one of ordinary skil in the art would be motivated to optimize the two frequencies through routine experimentation. The Applicant's respectfully disagree. As the Examiner is aware, optimization through routine experimentation is only a permissible basis for rejection where the parameter to be "optimized" is a results-effective variable. (*MPEP* §2144.05.II.B.)

Here, the Examiner notes that each of *Demaray*, *Georgeiva*, and *Leiberman* each disclose different frequencies. However, none of the cited references teaches or suggests that the selected frequencies may be varied to provide any specific result. With the exception of the small, low-frequency range of 100 to 400 kHz provided by Demaray, each of the cited references discloses only a single pair of frequencies. Accordingly, none of the references teach or suggest that the selection of the frequencies is a results-effective variable, as required to assert the basis of rejection applied by the Examiner. As such, a *prima facie* case of obviousness has not been established with respect to claim

33 as there is no motivation to combine the references in the manner asserted by the Examiner.

Thus, the Applicants submit that claims 13 and 33 are patentable over *Demaray*, in view of *Georgieva*, and in further view of *Lieberman*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claims allowed.

D. 35 USC §103 Claim 14

Claim 14 stands rejected under 35 USC §103 as being unpatentable over U.S. Patent Application Publication No. 2003/0148611 to *Dhindsa, et al.* (hereinafter *Dhindsa*), in view of *Demaray*, in view of *Georgieva*, and in further view of *Lieberman*. The Applicants respectfully disagree.

Claim 1, from which claim 14 depends, recites limitations not taught or suggested by any combination of the cited art. The patentability of claim 1 over the combination of *Demaray*, in view of *Georgieva*, and in further view of *Lieberman* is discussed above.

Dhindsa discloses a dual electrode processing chamber, utilizing confinement rings, a focus ring, and a shield, wherein the second electrode is coupled to a dual frequency RF power source. Specifically, *Dhindsa* discloses that the "presence of the focus ring [and the confinement rings] allows the equipotential field lines to be disposed substantially uniformly over the entire surface of the wafer." (*Dhindsa*, p. 3, ¶ [0032]). *Dhindsa* discloses that the "presently-claimed configuration," including the focus ring, confinement rings, and shield, is required to achieve substantially improved etch rate uniformity. (p. 3, ¶ [0036]).

Dhindsa fails to teach or suggest a method wherein an interaction between the first and second RF signals is used to control at least one characteristic of a plasma formed in the etch chamber, as recited in claim 1, or wherein the interaction between the first and second RF signals is used to control the uniformity of a plasma enhanced etch process, as recited in claim 14.

Accordingly, a *prima facie* case of obviousness has not been established because *Dhindsa* fails to teach or suggest a modification to the teachings of the combination of other references in a manner that would yield the limitations recited in the claims.

Moreover, obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. (*MPEP* §2143.01.) Here, the Examiner fails to assert any teaching, suggestion, or motivation to combine the cited references. The Examiner cites it would be obvious to use the apparatus of *Dhindsa* to control the uniformity of an etch process because *Dhindsa* discloses such a method. However, the *Dhindsa* discloses a different method for controlling an etch process and fails to teach or suggest a modification of the primary references in a manner that would yield the limitations recited in the claims. As such, a *prima facie* case of obviousness has not been established because the combination of the cited references fails to yield the limitations recited in claim 14 and further because no motivation exists for the modification proposed by the Examiner.

Thus, the Applicants submit that claim 14 is patentable over *Dhindsa*, in view of *Demaray*, in view of *Georgieva*, and in further view of *Lieberman*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claim allowed.

E. 35 USC §103 Claims 34-35 and 37-39

Claims 34-35 and 37-39 stand rejected under 35 USC §103 as being unpatentable over *Dhindsa* in view of *Lieberman*. The Applicants respectfully disagree.

The teachings of both *Dhindsa* and *Lieberman* are discussed above. Neither *Dhindsa* nor *Lieberman*, alone or in combination teach or suggest all of

the limitations recited in either of independent claims 34 or 37. Specifically, the cited references do not suggest or teach determining a desired energy distribution of the plasma and producing the desired energy distribution through a controlled interaction between a first and a second RF signal applied to a first electrode disposed in a processing chamber, as recited in claim 34, or supplying a first RF signal at a first power level to a first electrode disposed in an etch chamber and controlling the application of a second RF signal at a second power level to the first electrode to produce a desired power distribution in the plasma, as recited in claim 37.

The Examiner supports the obviousness rejection by stating that one of ordinary skill in the art would be motivated to modify the teachings of *Dhindsa* with those of *Leiberman* by combining "an effect which yields a center low energy distribution with an effect that yields a center high energy distribution in order to obtain a resulting substantially flat uniform energy or power distribution." The Applicants respectfully disagree.

Although Leiberman provides some examples of energy distributions formed from 13.56 and 40.7 MHz, *Leiberman* fails to teach or suggest the energy distributions suggested by the Examiner. Furthermore, *Leiberman* fails to teach or suggest what the resultant energy distribution would be for any combination of frequencies applied to a single electrode. As such, a *prima facie* case of obviousness has not been established as the combination of the cited references fails to yield the limitations recited in the claims.

The Examiner further contends that one skilled in the art would be motivated to optimize through routine experimentation of the power ratio between the two signals, citing *MPEP* §2144.05(II)(B). However, as the Examiner is aware, "[a] particular parameter must first be recognized as a result-effective variable… before the determination of the optimum or workable ranges of said variable might be characterized as routine experimentation." (*Id.*, citing, *In re Antonie*, 559 F.2d 618, 195 USPQ 6 (CCPA 1977).) In this instance, no references show that the power ratio between the two RF signals is a result-

effective variable. Accordingly, claims 34-35 and 37-39 are further patentable over the cited art.

Thus, the Applicants submit that claims 34-35 and 37-39 are patentable over *Dhindsa* in view of *Lieberman*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claims allowed.

F. 35 USC §103 Claim 36

Claim 36 stands rejected under 35 USC §103 as being unpatentable over *Dhindsa*, in view of *Lieberman* and *Georgieva*. The Applicants respectfully disagree.

Independent claim 34, from which claim 36 depends, recites limitations not taught or suggested by any permissible combination of the cited art. The patentability of claim 34 over *Dhindsa* in view of *Lieberman* is discussed above. Each reference discloses providing a specific set of frequencies by a dual frequency power source, *i.e.*, *Dhindsa* (2MHz and 27 MHz), *Georgieva* (27 MHz and 2MHz), and *Lieberman* (13.56 MHz and 40.7 MHz).

The Applicants note that the Examiner relies on *Demaray* disclosing a specific set of frequencies by a dual frequency power source (13.56 MHz and 100-400 KHz) in the body of the rejection as a supporting reference in combination with the other references, without citing *Demaray* in the statement of the rejection. As the Examiner is aware, "where a reference is relied on to support a rejection, whether or not in a minor capacity, that reference should be positively included in the statement of the rejection." MPEP §706.02(j), (citing *In re Hoch*, 428 F.2d 1341, 1342 n.3 166 USPQ 406, 407 n. 3 (CCPA 1970)). The Applicants presume that the Examiner intended to include *Demaray* in the statement of the rejection and address the reference accordingly. Accordingly, the Applicants treat this rejection as *Dhindsa*, in view of *Lieberman, Georgieva,* and *Demaray.*

No combination of the cited references disclose, suggest or teach applying about a 2 MHz frequency and about a 13.56 MHz frequency from a first and

second RF source, respectively, to a first electrode, as recited in claim 36. The Examiner supports this rejection by stating "one who is skilled in the art would be motivated to optimize through routine experimentation of frequency mixing using commercially available RF power supplies," citing MPEP §2144.05(II)(B).

In considering whether optimization through routine experimentation is proper support for an obviousness rejection, the CCPA has held that "[i]n determining whether or not such experimentation is within the teachings of the art, we must be ever alert not to read obviousness into an invention on the basis of the [Applicants'] own statements; that is, we must view the prior art without reading into that art [Applicants'] teachings. In re Waymouth, 499 F.2d 1273, 1276 (C.C.P.A. 1974). The Examiner asserts that *Demaray* discloses that the highest ion bombardment is obtained at a lowest frequency, and that *Georgieva* and *Lieberman* disclose that different frequencies have different energy distributions. However, as discussed above, there is no teaching or suggestion that the particular frequencies as recited in the claims are results-effective variables.

Moreover, there is no teaching or suggestion in any of the cited references of determining a desired energy distribution of the plasma and producing the desired energy distribution through a controlled interaction between a first and a second RF signal applied to a first electrode disposed in a processing chamber, wherein the first RF signal has a frequency of about 2 MHz and the second RF signal has a frequency of about 13.56 MHz as recited by claim 36. As such, the Applicants' method of controlling characteristics of a plasma can not be determined through "routine experimentation." As such, a *prima facie* case of obviousness has not been established as the combination of the cited references fails to yield the limitations recited in the claims

Thus, the Applicants submit that claim 36 is patentable over *Dhindsa*, in view of *Lieberman*, *Georgieva*, and *Demaray*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claim allowed.

CONCLUSION

Thus, the Applicants submit that all claims now pending are in condition for allowance. Accordingly, both further consideration of this application and its swift passage to issue are earnestly solicited.

If, however, the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Alan Taboada at (732) 935-7100 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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